2.Q PLUGGING AND ABANDONMENT PLAN

Submit a plan for plugging and abandonment of the well Including (1) describe the type, number, and placement (including the elevation of the top and bottom) of plugs to be used; (2) describe the type, grade, and quantity of cement to be used; and (3) describe the method to be used to place plugs, including the method used to place the well in a state of static equilibrium prior to placement of the plugs. Also, for a Class III well that underlies or is in an exempted aquifer, demonstrate adequate protection of USDWs. Submit this information on USEPA Form 7520-14, Plugging and Abandonment Plan.

RESPONSE

The following completed copies of US EPA Form 7520-14 and Plugging and Abandonment Plan, are submitted to satisfy this requirement. The modifications made to this form are to provide consistency with all available and current information. Costs based on recent third party estimates which are associated with the plugging and abandonment of the wells per the following procedures are presented in the completed plugging forms, Table Q-1, and in Response 2.R of this document.

The following is the proposed plan for plugging and abandonment of the proposed Powertech non-hazardous Dewey-Burdock Disposal Wells. Note that cement volume is based on the well with the largest casing capacity (DW No. 1) and would be less than stated herein for DW Nos. 2, 3, 4, and additional disposal wells. Plugging assumes filling casing with cement from top to bottom.

- 1. Install a test gauge on the annulus to perform a static pressure test. Ensure that the annulus is fluid filled and that the well has been shut-in for a minimum of 24 hours. Pressurize annulus to approximately 500 psig and isolate from the annulus system. Monitor annular pressure for one hour. The test will be successful if the pressure change is less than 10 percent of the starting pressure.
- 2. Prepare well and location for plugging. Remove wellhouse, well monitoring equipment and wellhead injection piping.
- 3. Move in and rig-up workover rig, mud pump, circulating pit and pipe racks as necessary. Flush well with approximately 100 bbl of brine.
- 4. Remove wellhead and release slips.
- 5. Release injection packer. Displace annular fluid from well into injection formation by flushing with approximately 100 bbl of brine.
- 6. Pull and lay down the injection tubing and packer.
- 7. Pump approximately 384 sacks (calculated for disposal well with largest casing capacity) of Class A cement with 4 percent bentonite (14.1 ppg, 1.55 cf/sx yield) into cased hole in 2 3 stages from the bottom up.
- Cut off wellhead approximately 3' BGL and weld cap with permanent marker on casing.
- 9. Rig down and move out pulling unit and equipment.
- Submit required plugging records to USEPA and SD DENR

Post-Closure Care Requirements

Powertech will provide notification of closure for the Class V wells to USEPA, Region 8, the SD DENR and the local zoning authorities. Included with the notification will be information regarding the nature of the historic injected waste stream, identification of the depths of the injection and confining zones, well schematics and plugging records. Powertech will retain, for a period of three years following the Class V well closure, records reflecting the nature, composition and volume of all injected fluids. Upon request of the director of USEPA, Region 8, Powertech will then deliver the records to the director at the conclusion of the retention period, or dispose of such records.

FORM 7520-14 PROPOSED WELL PLUGGING AND ABANDONMENT

United States Environmental Protection Agency Washington, DC 20460

PLUGGIN	G AND AB	ANDONI	IENT PL	AN				
Name and Address of Facility		Name and Ad	dress of Owne	r/Operator				
Dewey-Burdock Disposal Well No. 1 (DW No. 1) 310 2nd Avenue, Edgemont, SD, 57735		Powertech (5575 DTC I	(USA), Inc. Parkway, Suit	e 140, Gree	nwood Vill	age, CO, 80	111	
Locate Well and Outline Unit on	State		County		Permit	Number		
Section Plat - 640 Acres	South Dakota		Fall River		TBD			
	Surface Location	Description						
	1/4 of ne 1	/4 of <u>nw</u> 1/4 o	of SW 1/4 of	Section 2	Township	7S Range	IE	
	Locate well in two	directions fro	om nearest line	es of quarter	section and	d drilling unit	t	
	Surface Location 845 ft. frm (N/S) S Line of quarter section							
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s ·	_ease Name Dev	vey-Burdock		Well Numi	ber TBD			
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Sacks of Cement To Be Used (each plug)	383							
Slurry Volume To Be Pumped (cu. ft.)	594				L			
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Measured Top of Plug (if tagged ft.)	The state of the s			 				
Slurry Wt. (Lb./Gal.)	14.1							
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Estimated Cost to Plug Wells								
\$100,000								
	Certifi	cation						
I certify under the penalty of law that I have personally								
attachments and that, based on my inquiry of those in information is true, accurate, and complete. I am awa possibliity of fine and imprisonment. (Ref. 40 CFR 144	re that there are s			-				
Name and Official Title (Please type or print)	Signature					Date Signed	i	
Richard Blubaugh, Vice President - Environmental					i			
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United States Environmental Protection Agency Washington, DC 20460

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	Wall 2 C	uálima II-i4			tate				ounty			Number	
	ate Well and O tion Plat - 640 A				South D	akota		F:	all River		TBD		
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United States Environmental Protection Agency

⇔EPA PLUGO	GING ANI	D ABA		ENT PL	AN			
Name and Address of Facility		<u>N</u>	ame and Addr	ess of Owne	r/Operator			
Dewey-Burdock Disposal Well No. 3 (DW No. 3) 310 2nd Avenue, Edgemont, SD, 57735			Powertech (U 5575 DTC Pa	ISA), Inc. irkway, Suit	e 140, Gree	nwood Villa	age, CO, 80	111
	State		<u>C</u>	ounty	1	Permit	Number	
Locate Well and Outline Unit on Section Plat - 640 Acres	South D	akota		Custer		TBD		•
	Surface L	ocation De	escription					
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						** *** ***	Table 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 - 1000 -		2 + 1 1 199 + to 1				

information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Date Signed

Signature

Name and Official Title (Please type or print)

Richard Blubaugh, Vice President - Environmental

TABLE Q-1 Estimated Plugging Cost for Dewey-Burdock Disposal Wells

Cement (384 sx), pumping & equipment	\$9,600	1 1	\$9,600
Trucking Contract Labor Cement (384 sx), pumping & equipment	\$4,000 \$2,000 \$9,600	1 2 1	\$4,000 \$4,000 \$9,600
Cement (384 sx), pumping & equipment	\$9,600	1	\$9,600
Cement (384 sx), pumping & equipment	\$9,600	1	\$9,600
Contract Labor	\$2,000	2	\$4,000
Contract Labor	\$2,000	2	\$4,000
Contract Labor	\$2,000	2	\$4,000
Contract Labor			
Cement (384 sx), pumping & equipment	\$9,600	1	\$9,600
Cement (384 sx), pumping & equipment	\$9,600	1	\$9,600
Cement (384 sx), pumping & equipment Contingency	\$9,600 \$8,000		\$9,600 \$8,000
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	\$8,000	7	. ,
Total Estimated Subcontractor Charges			\$78,600
			40.70
Test Design and Project Management (hours)	\$115	24	\$2,760
Supervision (days)	\$850	5	\$4,250
Travel (hours)	\$115	8	\$920
Field Truck and Fuel (days)	\$150	6	\$900
` • <i>,</i>	•		
Per Diem (days)	\$100	6	\$600
Data Analysis (lump sum)	\$2,000	1	\$2,000
Report Preparation (hours)	\$115	24	\$2,760
Total Estimated Petrotek Charges			\$14,190
rotal Ediffication of algeo		<u></u>	Ψ17,130
TOTAL ESTIMATED COST PER WELL			\$92,790
TOTAL ESTIMATED COST FOR FOUR WELLS			\$371,160

Assumptions:

P&A costs are for well with largest casing capacity (DW No. 1); other P&A costs would be lower Subcontractors will bill Powertech directly - otherwise a 12.5% markup will apply.

Field activities can be completed in 5 days; otherwise T&M rates will apply.

Falloff test is required if > 6 months since last test; RAT log required if > 2 years since last log. The well is cemented from bottom to top in 2 - 3 stages.

Powertech will be responsible for disposal of all well equipment.



2.R NECESSARY RESOURCES

Submit evidence such as a surety bond or financial statement to verify that the resources necessary to close, plug, or abandon the well is available.

RESPONSE

Powertech will provide a surety instrument equal to the estimated cost for plugging and abandonment of the proposed disposal wells as a condition prior to the commencement of construction. A detailed plugging and abandonment estimate is presented as Table Q-1. The annual updates of Powertech's financial surety estimate will be reviewed and approved by both the USEPA and the U.S. Nuclear Regulatory Commission once a license is issued.

With respect to continued demonstration of financial assurance, the surety instrument will be maintained as required by applicable regulations. Within ninety (90) days after the close of each fiscal year, the permittee will obtain verification that the amount used for financial assurance is sufficient to address updated plugging and abandonment costs and will submit updated financial assurance information if the cost of plugging and abandonment has exceeded the existing financial assurance. In such an event, the information submitted to the Director will consist of a letter from the permittee regarding the change in the financial assurance requirements, verification from the appropriate financial institution regarding the increased financial assurance and a copy of the independent geologist or engineering estimate of the updated plugging and abandonment costs.